

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SALVADOR HERNANDEZ,)	
)	
Plaintiff,)	Case No. 15 CV 5682
v.)	
)	Judge Andrea R. Wood
R&R LAUNDRY SOLUTIONS, INC., and)	
ROCHELLE REAUMOND, individually,)	Magistrate Judge Maria Valdez
)	
Defendants.)	

**JOINT MOTION FOR COURT
APPROVAL OF SETTLEMENT**

Plaintiff Salvador Hernandez (“Plaintiff”) and Defendants R&R Laundry Solutions, Inc. and Rochelle Reaumont (“Defendants”), by and through their respective attorneys, jointly move the Court approve the settlement agreed to by the Parties and submitted to chambers for *in camera* review. In support of the motion, the Parties state as follows:

1. On June 26, 2015, Plaintiff filed his complaint against Defendants under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*, the Illinois Minimum Wage Law, 820 ILCS 105/1 *et seq.*, and the Illinois Wage Payment and Collection Act, 820 ILCS 115/1 *et seq.*, arising out of his former employment with Defendants.

2. Following the exchange of information and arms-length negotiations between counsel, the Parties have reached a mutually satisfactory settlement, which both sides agree adequately compensates Plaintiff for any and all claims for alleged back wages, including any applicable overtime, arising from his employment with Defendants.

3. When employees bring a private action against their employer or former employer for alleged back wages under the FLSA, and the parties present to the district court a proposed

settlement, the district court may enter a stipulated judgment dismissing the case after scrutinizing the settlement to insure that it is a fair and reasonable resolution of a bona fide dispute over wages under the FLSA. *See Walton v. United Consumers Club, Inc.*, 786 F.2d 303, 306 (7th Cir. 1986); *Lynn's Food Stores v. United States*, 679 F.2d 1350, 1355 (11th Cir. 1982).

4. Submitted herewith to chambers, for *in camera* review by the Court, is the Settlement Agreement entered into between Plaintiff and Defendants, as well as a proposed Order Approving Settlement. The parties respectfully request that this Settlement Agreement not become part of the record in this case.

5. The Parties jointly request that the Court approve the Settlement Agreement because it is a fair and reasonable solution of bona fide disputes over wages under the FLSA.

6. The Parties further request that the Court dismiss this case without prejudice pursuant to the terms of the Settlement Agreement. The parties have submitted a proposed order to that effect to the Court's proposed order email address.

WHEREFORE, for the foregoing reasons, the Parties respectfully request that this Court enter an Order approving the Settlement Agreement as a fair and reasonable resolution of bona fide disputes under the FLSA.

Respectfully Submitted,

Dated: October 30, 2015

Plaintiff Salvador Hernandez <u>s/Lydia Colunga-Merchant</u> Lydia Colunga-Merchant Yolanda Carrillo Raise the Floor Alliance – Legal Dept. 1 N. LaSalle, Suite 1275 Chicago, IL 60602 (312) 795-9115	Defendants R&R Laundry Solutions, Inc. and Rochelle Reaumont, individually <u>s/David Fish</u> David Fish Kimberly Hilton The Fish Law Firm, P.C. 200 E. 5 th Ave, Suite 123 Naperville, IL 60563
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on this 30th day of October, 2015, the foregoing Joint Motion for Court Approval of Settlement was filed electronically with the Clerk of Court using the ECF system, which sent notification of such filing to the following:

David Fish
Kimberly Hilton
The Fish Law Firm, P.C.
200 E. 5th Ave., Suite 123
Naperville, IL 60563

s/Lydia Colunga-Merchant